## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

**Newport News Division** 

UNITED STATES OF AMERICA :

•

vs. : 4:24-CR-1

:

**JAYQUAN ALLEN JONES** 

2.

3.

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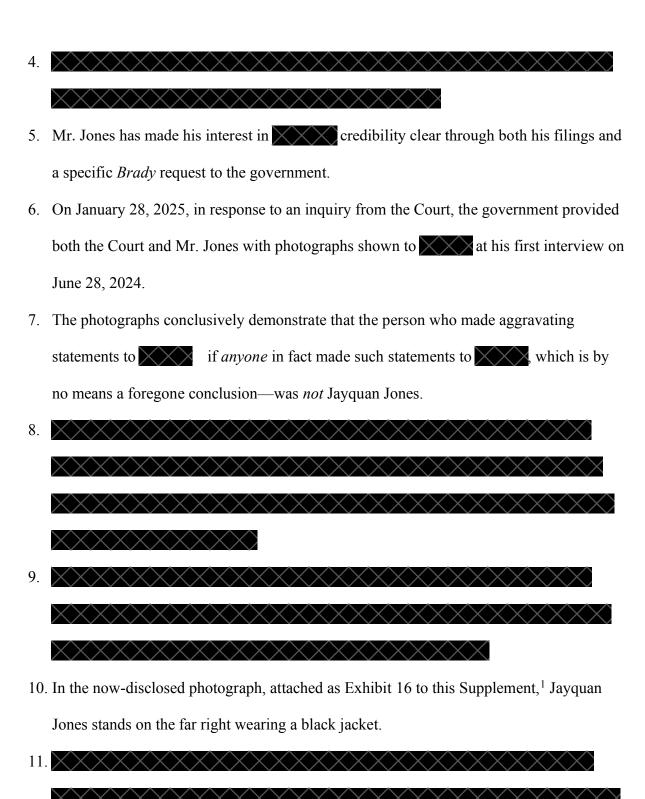
Defendant. : Honorable Elizabeth W. Hanes

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## SUPPLEMENT TO MEMORANDUM IN AID OF SENTENCING

Mr. Jones writes to supplement his Memorandum in Aid of Sentencing with previously undisclosed exculpatory evidence and to ensure that the exculpatory evidence is in the record of this case.

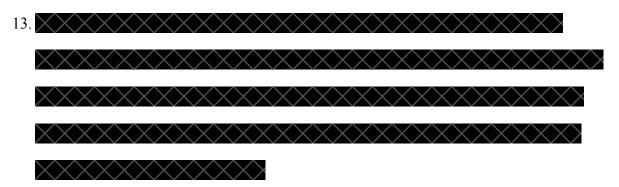
Mr. Jones has pointed out that although
$\times$



<sup>&</sup>lt;sup>1</sup> To prevent confusion, this Supplement uses the same exhibit numbering used in the underlying police report.



12. In the now-disclosed photograph, attached as Exhibit 17 to this Supplement, Jayquan Jones stands on the far left wearing a black jacket without a shirt.



- 14. In the now-disclosed photograph, attached as Exhibit 19 to this Supplement, Jayquan

  Jones stands on the far left wearing the black jacket. Thus, by own statements,
  he is *not* the person "who told the details regarding Mitchell's murder."
- 15. This exculpatory evidence further confirms that Jayquan Jones did not make the claimed aggravating statements to
- 16. Mr. Jones reiterates his request that the Court strike ¶ 14 of the PSR, and not rely on the government's arguments that are based solely on claims.

Respectfully submitted, **JAYQUAN ALLEN JONES** 

s/ Bernadette Donovan

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## Counsel for Jayquan Allen Jones

## **CERTIFICATE OF SERVICE**

I, Bernadette Donovan, Esq., hereby certify that on this January 29, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. A Notice of Electronic Filing will be served on:

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